

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

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TODD WOLF,

Plaintiff,

Case No.: 23-cv-149

v.

CITY OF SHEBOYGAN, MAYOR RYAN SORENSON in his individual and official capacity, CITY ATTORNEY CHARLES ADAMS in his individual and official capacity, ALDERWOMAN BARBARA FELDE, in her individual and official capacity, ALDERWOMAN ROBERTA FILICKYPENESKI, in her individual and official capacity, ALDERWOMAN AMANDA SALAZAR, in her individual and official capacity, ALDERWOMAN ANGELA RAMEY, in her individual and official capacity, ALDERWOMAN BETTY ACKLEY, in her individual and official capacity, ALDERMAN ZACHARY RUST, in his individual and official capacity, ALDERMAN DEAN DEKKER, in his individual and official capacity, ALDERWOMAN GRAZIA PERRELLA, in her individual and official capacity, PRESIDENT SHEBOYGAN AREA SCHOOL DISTRICT MARY LYNNE DONOHUE, in her individual capacity; MAYA HILTY; and JILL HALL,

Defendants.

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**DECLARATION OF ATTORNEY WARREN E. BULIOX IN SUPPORT OF  
DEFENDANTS CITY OF SHEBOYGAN, MAYOR RYAN SORENSON,  
CITY ATTORNEY CHARLES ADAMS, ALDERPERSON BARBARA FELDE,  
ALDERPERSON ROBERTA FILICKYPENESKI, ALDERPERSON AMANDA  
SALAZAR, ALDERPERSON ANGELA RAMEY, ALDERPERSON BETTY ACKLEY,  
ALDERPERSON ZACHARY RUST, ALDERPERSON DEAN DEKKER,  
ALDERPERSON GRAZIA PERRELLA'S BRIEF IN SUPPORT OF THEIR FEDERAL  
RULE OF CIVIL PROCEDURE 12(b)(6) PARTIAL MOTION TO DISMISS  
PLAINTIFF'S COMPLAINT**

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STATE OF WISCONSIN, COUNTY OF MILWAUKEE) ss:

I, Warren E. Buliox, pursuant to 28 U.S.C. § 1746, hereby depose and state under penalty of perjury as follows:

1. I am an attorney at the law firm of MWH Law Group LLP and an adult resident of the State of Wisconsin. I am one of the attorneys of record for the Defendants City of Sheboygan, Mayor Ryan Sorenson, City Attorney Charles Adams, Alderperson Betty Ackley, Alderperson Dean Dekker, Alderperson Barbara Felde, Alderperson Roberta Filicky-Peneski, Alderperson Grazia Perrella, Alderperson Angela Ramey, Alderperson Zachary Rust And Alderperson Amanda Salazar, and President of Sheboygan Area School District Mary Lynne Donohue (“Defendants”), and I make this Declaration based up on my personal knowledge and review of this case.

2. I am familiar with the facts of this matter and the documents provided in support of Defendants’ Partial Motion to Dismiss and Brief in Support of Partial Motion to Dismiss. I make the following statement based upon my personal knowledge and belief.

3. A true and correct copy of Plaintiff’s November 7, 2022 letter to Common Council is attached as **Exhibit 1**.

4. A true and correct copy of the Public records that further confirm that the property on which the First Congregational Church is located is owned by the Church is attached as **Exhibit 2**.

5. A true and correct copy of the emails exchanged between Plaintiff’s attorney and City Attorney Adams from November 16 – December 1, 2022 are as attached as **Exhibit 3**.

6. A true and correct copy of the texts City Attorney Adams and Plaintiff’s counsel exchanged on November 1, 2022 and December 6, 2022 are attached as **Exhibit 4**.

7. True and correct copies of the following unpublished cases cited in Defendants’

Brief in Support of their Federal Rule of Civil Procedure 12(b)(6) Partial Motion to Dismiss Plaintiff's Complaint are attached hereto as **Exhibits 5-9**:

- *Bey v. Walker*, 2011 U.S. Dist. LEXIS 66222 (E.D. Wis, June 20, 2011);
- *Henige v. Bd. of Regents of the Univ. of Wis. Sys.*, 2021 U.S. Dist. LEXIS 26222 (E.D. Wis., February 11, 2021);
- *Hobbs v. Shesky*, 2022 U.S. Dist. LEXIS 202037 (E.D. Wis., November 7, 2022);
- *Miller v. Apropos Tech, Inc.*, 2003 U.S. Dist. LEXIS 5074 (N.D. Ill., March 31, 2003); and
- *Schuepbach v. Leistikow Props., LLC*, 2020 Wisc. App. LEXIS 48 (Wis. Ct. App., January 30, 2020).

**MWH LAW GROUP LLP**

/s/ Warren E. Buliox

Warren E. Buliox